

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ARGONAUT INSURANCE )  
COMPANY )  
 )  
Plaintiff )  
 )  
v. )  
 ) CIVIL ACTION NO. 2:20-cv-117  
GENERAL TRADE )  
CORPORATION, SPECIALTY )  
STEAL PRODUCTS, INC., GULF )  
MATERIALS, LLC, GULF )  
TRADING & TRANSPORT, LLC, )  
CLIFFORD C. WISE, AND )  
BARBARA A. WISE )  
 )  
Defendants

**PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER,  
PRELIMINARY INJUNCTION AND PERMANENT INJUNCTION**

For the reasons set forth in the accompanying Brief in Support and supported by the Verified Complaint, Plaintiff, Argonaut Insurance Company ("AIC"), moves this Court pursuant to Rule 65 of the Federal Rules of Civil Procedure to issue a temporary restraining order and an injunction preliminarily and permanently compelling Defendants to perform their specific obligations under the Indemnity Agreement by deposit with AIC collateral in the amount of \$1,248,283.36 in the form of (a) an irrevocable letter of credit issued by a financial institution acceptable to AIC; (b) a pledged money market account issued by a financial institution acceptable to AIC; and/.or (c) other collateral acceptable to AIC.

A proposed order of Court is attached.

Respectfully submitted,

DICKIE, MCCAMEY & CHILCOTE, P.C.

BY: /s/ W. Alan Torrance, Jr., Esquire

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Dated: January 24, 2020

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